

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TISA GRIMES,)
)
 Plaintiff,)
)
 v.) Civil Action No.:
) 1:20-cv-02045-SCJ
)
 PAUL HOWARD, in his individual)
 and official capacity,)
)
)
 Defendants.)

DECLARATION OF MARLENE ALLEN UNDER PENALTY OF
PERJURY PURSUANT TO 28 U.S.C. § 1746

1.

I, MARLENE ALLEN, a Georgia citizen, declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the following is true and correct:

2.

My name is **Marlene Allen**, I am older than 18 years of age, and I am sui juris and prepared to offer testimony in this case.

3.

On this 4th day of August 2022, I make this **DECLARATION** based upon my personal knowledge of its contents, and to the best of my knowledge everything contained in this **DECLARATION** is true and correct.

4.

I worked at the Fulton County District Attorneys' Office from 2004 through 2017 (I resigned in 2017), and then came back to work under Paul Howard in 2018 until present under the new District Attorney Fani Willis.

5.

While working in the office for the Fulton County District Attorney, Paul Howard was the District Attorney of Fulton County, and my boss.

6.

During the time that Paul Howard was my boss and during work hours at either building 136 Pryor Street/141 Pryor Street, on too many times to remember, Paul Howard routinely made sexual advances towards me by making unsolicited and unwanted comments about my body parts such as "I just want to suck on your breast," "I want some," and when I would respond by saying "want some what" he would say "I want some of that."

7.

During the time that Paul Howard was my boss and during work hours at building 136 Pryor Street/141 Pryor Street, on too many times to remember, Paul Howard routinely called me into his office while he was having a meeting and requested me to write on the chalk board. When I would be writing on the chalk board, I'd occasionally turn around to look at Paul Howard and he would be staring at my buttocks; he usually called me after those meetings and made a sexual comment about my buttock. Eventually I got so tired of being called into his office for this sole purpose that I began refusing to come to his office for that purpose by not answering his call or say that I was out for lunch.

8.

During the time that Paul Howard was my boss and during work hours at building 136 Pryor Street/141 Pryor Street, Paul Howard left me lingerie from Victoria Secret, on my work desk when I was working in 136

Pryor Street Address, asking me had a seen the package and that he wanted to see me in the underwear. He told me that was my Valentine's Day present.

9.

During the time that Paul Howard was my boss, Paul Howard never had a problem with me being late to work or taking off work whenever I wanted to, until I would try to avoid him and refuse to accompany him to outside business functions; when that happened, suddenly I would be required to sign a sign-in sheet demonstrating what time I arrived to work, and he would begin to harass me by piling on job tasks that were actually unrelated to my normal job duties.

10.

During the time that Paul Howard was my boss and during work hours at building 136 Pryor Street/141 Pryor Street, he tried to give me an unsolicited kiss on my lips, and I had to push away from him to avoid him kissing me.

11.

Paul Howard's routine practice with me was to make unsolicited sexual comments and if I rejected his advances, he would make my job harder and make me feel as if I would lose my job until I played along with his unwanted sexual harassment.

12.

Paul Howard's would routinely make unprovoked comments to me such as telling me that he loved me and that he desired me and that he wanted to have sex with me. This made me feel very uncomfortable.

13.

Paul Howard's sexual harassment of me was so continuously, non-stop bad, in the work place, that when I had to visit his office, I would put

on a jacket or something to cover up because he would always stare at my chest, and many times even before going to work, I would decide what I would wear for that day based on whether I thought I would have to interact with Paul Howard.

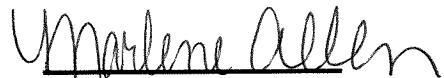
14.

Paul Howard's sexual harassment was so bad that in February 2020, after I had a very personal female related surgery, one of the first things he said to me after my surgery was "so when did the doctor say you could have sex, I want some."

15.

Occasionally, I would confront him about rumors related to him dating Cathy Carter by asking him "aren't you messin' with Cathy," and he would respond "no, Cathy is crazy."

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 4th day of August, 2022.



Marlene Allen